

ENFORCEMENT SUMMARY

Name and Address of Company

Commercial Disposal Company
17 Town Way
West Springfield, MA 01090

Date of Inspection

December 12, 1984

State Enforcement History

CD was inspected jointly by EPA and DEOE on May 22, 1984. EPA issued an administrative order and assessment of penalties for the violations found during this inspection. DEOE inspected CD again on June 20, 1984. The violations detected during this inspection were similar to those detected during the May 22, 1984 inspection. DEOE issued an NOV to CD on June 25, 1984. DEOE inspected CD on October 17, 1984. DEOE issued an NOV to CD on October 30, 1984 for inadequate operating records (310 CMR 30.542) and exceeding design capacity specified on their Part A (310 CMR 30.099).

Recommended Enforcement Response

On August 27, 1984, EPA issued an administrative order and assessment of penalties to CD. Currently, CD is appealing this order. The outstanding administrative order should be amended to include the most recent violations.

CONCURRENCES

SYMBOL	SWPB						
SURNAME	MJOD						
DATE	12/21/84						

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Recommended Enforcement Response

On August 27, 1984, EPA issued an administrative order and assessment of penalties to CD. Currently CD is appealing this order. The outstanding administrative order should be amended to include the most recent violations.

ENFORCEMENT SUMMARY

Name and Address of Company

Commercial Disposal Co., Inc.
P.O. Box 304
West Springfield, MA 01090

Date of Inspection

May 22, 1984

State Enforcement History

An initial inspection of the facility was conducted on January 7, 1982 by a DEQE Western Region inspector. Many of the violations found during the current inspection were noted on the 1982 inspection checklist (attached) including lack of waste analysis plan, training records and contingency plan. These were noted as "to be submitted". No enforcement action was taken.

Two other "informal" inspections were conducted by Western Region personnel three weeks prior and the day prior to our inspection. According to the inspector, violations were pointed out to the facility operator. No enforcement action was taken.

Recommended Enforcement Response

Previous inspections by DEQE personnel have yielded no enforcement actions and/or move toward compliance on the part of Commercial Disposal. The violations found are both numerous and substantial. The recommendation then is to make a determination that DEQE's actions have not been timely and appropriate, and to issue an Administrative Order with penalties under EPA's jurisdiction.